

EXHIBIT 455

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL :
PRESCRIPTION : MDL No. 2804
OPIATE LITIGATION :

: Case No.
: 1:17-MD-2804
THIS DOCUMENT RELATES :
TO ALL CASES : Hon. Dan A. Polster

- - -

Thursday, January 3, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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Videotaped deposition of JILL A. STRANG, held
at the offices of Cavitch, Familo & Durkin,
1300 East Ninth Street, Cleveland, Ohio, commencing at
8:57 a.m., on the above date, before Carol A. Kirk,
Registered Merit Reporter and Notary Public.

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1	A. They call if they need -- if they	1	necessarily limiting it to you, but I can ask
2	have questions, if they need something. I do	2	follow -- I'll ask follow-ups, but describe for
3	communicate with all of the stores.	3	me what DDM's policies and procedures are
4	Q. Is it mostly a, "Hey, Jill, we	4	regarding the diversion of opioids.
5	need this many bottles of this drug and it	5	A. Are you referring to when they
6	didn't show up on time or we need it by this	6	order from me, from the distribution center?
7	date"?	7	Q. Just kind of -- what I'd like you
8	Is that mostly what it's like?	8	to do is give me a full picture of what DDM does
9	A. Every day when the trucks are	9	to prevent diversion and comply with the CSA.
10	there, if they need something, if they have	10	A. Okay. So what we do is, the
11	questions about different topics, recalls. I	11	stores order weekly.
12	mean, I talk to everybody about all the topics.	12	Q. Okay.
13	Q. Okay.	13	A. It is ordered through a system
14	A. Daily.	14	called Pioneer. It gives them a recommended
15	Q. Do you also communicate or act as	15	order. Each store can set their own minimums
16	an intermediary between DDM and distributors or	16	and maximums on that. So that way, you know,
17	manufacturers?	17	everything is -- certain stores -- depending on
18	A. I do.	18	how much they've been dispensing. That order is
19	Q. Because you're the buyer, right?	19	sent over.
20	A. Yes.	20	As soon as they send the order,
21	Q. So you're the primary person	21	they receive back a document that says, "Order
22	communicating with them, at least on the front	22	items over six-week average." They're given the
23	end, to get product, correct?	23	opportunity right there to review any items.
24	A. Yes.	24	Sometimes it has no items. I've seen a few that
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1	Q. Okay. Presumably somebody else	1	have just antibiotics on them, you know, nothing
2	pays invoices later and they probably	2	controlled. And, you know, they ordered three
3	communicate with their financial department, but	3	bottles instead of two bottles. But they are
4	you're primarily communicating with them on a	4	given that chance to review if anything
5	drug procurement level, right?	5	populates over a six-week average. They have
6	A. Yes.	6	the opportunity to send that to me.
7	Q. And that would include, you know,	7	As we get the orders, prior to
8	issues regarding diversion and suspicious order	8	2016, we had a -- it was called a pick ticket.
9	monitoring?	9	It was a manual way of pulling. And the pullers
10	A. Yes.	10	would -- you know, if it says they wanted two of
11	Q. And drug thresholds and things	11	this, they'd put two, and they'd manually write
12	like that?	12	two. Items on that pick ticket would have an
13	A. Yes.	13	asterisk next to it if it could have been on the
14	Q. Okay. And as the individual at	14	six-week average report, over six-week average.
15	DDM primarily responsible for suspicious order	15	It was very rare that any controls
16	monitoring on the distribution end, you agree	16	would show up on that. The other items --
17	that DDM has an obligation to monitor orders and	17	unless something -- again, the pullers know
18	shipments for suspicious -- or that look	18	their product. You know, if they wanted -- if
19	suspicious or may have red flags?	19	they normally pull one, two or three of
20	A. Yes.	20	something and all of a sudden somebody wants 20
21	Q. Indicative of diversion?	21	of something, that would be brought to my
22	A. Yes.	22	attention.
23	Q. Okay. So tell me what -- and I'm	23	In our system, I have history of
24	just going to talk generally speaking. I'm not	24	every item. So I would go into the history of